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15   Attorneys for Defendants
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16   and OTTOMOTTO LLC

17   UNITED STATES DISTRICT COURT

18   NORTHERN DISTRICT OF CALIFORNIA

19   SAN FRANCISCO DIVISION

20   WAYMO LLC,   Case No.   3:17-cv-00939-WHA

21   Plaintiff,   **DECLARATION OF
                                          THOMAS J. PARDINI IN SUPPORT
22   v.   OF DEFENDANTS UBER
                                          TECHNOLOGIES, INC. AND
23   UBER TECHNOLOGIES, INC.,   OTTOMOTTO LLC'S
     OTTOMOTTO LLC; OTTO TRUCKING LLC,   ADMINISTRATIVE MOTION TO
24   FILE UNDER SEAL THEIR
                Defendants.   OPPOSITION TO WAYMO LLC'S
25   MOTION FOR JURY INSTRUCTION
                                          BASED ON SPOLIATION**

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PARDINI DECLARATION ISO DEFENDANTS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL
Case No. 3:17-cv-00939-WHA
sf-3843313

1   I, Thomas J. Pardini, declare as follows:

2   1.   I am a member of the Bar of the State of California and an attorney at the law firm

3   of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal

4   knowledge and if called as a witness, I could and would competently testify to the matters set

5   forth herein. I make this declaration in support of Defendants' Administrative Motion to File

6   Under Seal Their Opposition to Waymo LLC's Motion for Jury Instruction Based on Spoliation.

7   2.   I have reviewed the following documents and confirmed that only the portions

8   identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition to Waymo LLC's Motion for Jury Instruction Based on Spoliation ("Opposition")	Highlighted Portions	Plaintiff (Green)

14   3.   The green-highlighted portions of the Opposition contain information that has

15   been designated "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in

16   accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"),

17   which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6).

18   Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective

19   Order.

20   4.   Defendants' request to seal is narrowly tailored to the portions of their Opposition

21   and attached exhibits that merit sealing.

22   I declare under penalty of perjury that the foregoing is true and correct. Executed this

23   20th day of November, 2017 at San Francisco, California.

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25   _/s/ Thomas J. Pardini_
Thomas J. Pardini

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ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

Dated: November 20, 2017

/s/ Arturo J. González
ARTURO J. GONZÁLEZ